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Attorneys for Defendant

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

KOICHI TANIGUCHI)	CIVIL ACTION NO. 08-0008
)	
Plaintiff,)	
)	
vs.)	STIPULATION RE:
)	POTENTIAL CONFLICT
KAN PACIFIC SAIPAN, LTD. dba)	
Mariana Resort and spa)	
)	
Defendant.)	
)	

Come now Defendant KAN PACIFIC SAIPAN, LTD., and Plaintiff, Koichi Taniguchi, by and through counsel, and stipulate to the following:

Whereas, the Court brought to the attention of the parties the prior representation of Defendant by Plaintiff's counsel, Douglas F. Cushnie;

Whereas, having reviewed the matter, it appears that Mr. Cushnie last represented the Defendant in 1988 and never represented the Defendant on the same subject matter as the current

lawsuit and would not have had the opportunity to obtain confidential or privileged communications on the subject matter of this lawsuit; and

Whereas, Plaintiff and Defendant stipulate and agree that the background of the share owners and managers (current or past) of Kan Pacific Saipan, Ltd., is not an issue and will not become an issue in the present proceeding.

Therefore, Plaintiff and Defendant stipulate that they know of no conflict under the Model Rules of Professional Conduct that prevents Mr. Cushnie from representing the Plaintiff in this lawsuit and know of no potential for a conflict of interest to arise based upon Mr. Cushnie's prior representation of Kan Pacific Saipan Ltd..

Dated: 3/31/08

RICHARD PIERCE LAW OFFICE, LLC

By: 

RICHARD W. PIERCE

Attorney for Kan Pacific Saipan Ltd.

DOUGLAS F. CUSHNIE

Dated: _____

By: _____

DOUGLAS F. CUSHNIE

Attorney for Koichi Taniguchi

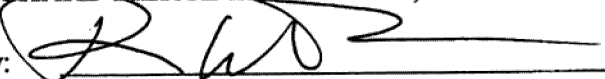
lawsuit and would not have had the opportunity to obtain confidential or privileged communications on the subject matter of this lawsuit; and

Whereas, Plaintiff and Defendant stipulate and agree that the background of the share owners and managers (current or past) of Kan Pacific Saipan, Ltd., is not an issue and will not become an issue in the present proceeding.

Therefore, Plaintiff and Defendant stipulate that they know of no conflict under the Model Rules of Professional Conduct that prevents Mr. Cushnie from representing the Plaintiff in this lawsuit and know of no potential for a conflict of interest to arise based upon Mr. Cushnie's prior representation of Kan Pacific Saipan Ltd..

RICHARD PIERCE LAW OFFICE, LLC

By:

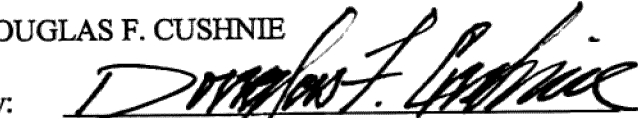


RICHARD W. PIERCE

Attorney for Kan Pacific Saipan Ltd.

DOUGLAS F. CUSHNIE

By:



DOUGLAS F. CUSHNIE

Attorney for Koichi Taniguchi